

KDE:DR
F.#2018R00551

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

FILED UNDER SEAL

- against -

COMPLAINT

ANASHON KAMALOV,
also known as “Anas,”

(18 U.S.C. § 1029(a)(4))

Defendant.

21-MJ-522

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EASTERN DISTRICT OF NEW YORK, SS:

ALAN FOWLER, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about March 11, 2021, within the Eastern District of New York and elsewhere, the defendant ANASHON KAMALOV, also known as “Anas,” together with others, did knowingly, and with the intent to defraud, possess device-making equipment, to wit: one Deftun MSR-X6 magnetic stripe card reader writer, which conduct affected interstate commerce.

(Title 18, United States Code, Section 1029(a)(4))

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary

1. I have been a Special Agent with the FBI since 2016, and I have been personally involved in the investigation of this matter. I am currently assigned to the FBI's Eurasian Organized Crime Task Force. In this capacity, I have participated in investigations concerning organized crime and violent crime, among other offenses. During my time with the FBI, I have participated in investigations of racketeering enterprises, extortion, unlawful drug trafficking, and violent crimes, including robbery and, among other things, have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of taped conversations, and have participated in investigations that included the interception of wire communications. I have also been involved in the investigation of cases involving the production, use and trafficking of counterfeit access devices.

2. On or about March 9, 2021, the Honorable Cheryl L. Pollak, Chief United States Magistrate Judge for the Eastern District of New York, signed a warrant (the "March 9 Warrant") authorizing the search of the residence of the defendant ANASHON KAMALOV (the "Premises").

3. On or about March 11, 2021, law enforcement agents with the Federal Bureau of Investigation executed the March 9 Warrant at the Premises. Prior to the execution of the March 9 Warrant, the defendant ANASHON KAMALOV had been arrested by agents with the Department of Homeland Security, Homeland Security Investigations, on a complaint signed in the Southern District of New York as part of a separate investigation.

to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. During the execution of the March 9 Warrant, agents encountered the defendant ANASHON KAMALOV's significant other. (KAMALOV had previously been arrested and removed from the Premises prior to the execution of the March 9 Warrant.) During the search of the Premises, which is a one-bedroom apartment, agents recovered from the entryway closet, among other things, one Deftun MSR-X6 magnetic stripe card reader/writer (the "Device"), shown in the photograph below:

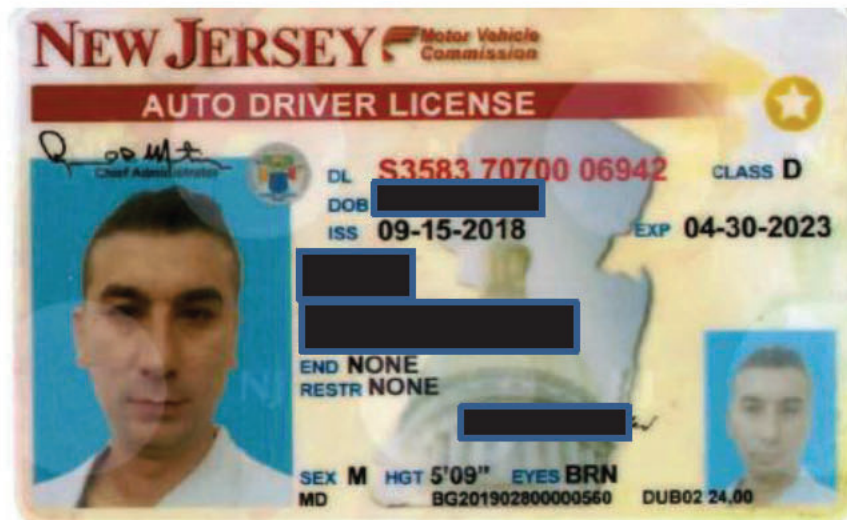


5. Based on my training, experience and involvement in the investigation, I know that such devices can be used to capture data from access devices, such as credit and debit cards, and impose such data on blank cards to manufacture fraudulent access devices. Indeed, the box containing the Device indicated that 20 blank magnetic stripe cards were included in the box. Only 16 blank magnetic stripe cards were recovered from the Premises during the search of the March 9 Warrant.

6. In addition, during the execution of the March 9 Warrant, agents also discovered a document that purports to be a New Jersey state driver's license (the "Fraudulent License"). This document was located in a wallet, which contained

documentation in KAMALOV's name, on top of the dresser in KAMALOV's bedroom.

The Fraudulent License contains a photograph of who I believe to be the defendant ANASHON KAMALOV but with the name and birthdate of another individual (the “Individual”), as shown in the photographs below²:



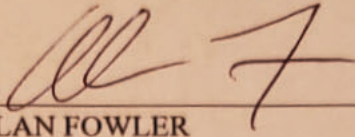
² The Individual's name, address, date of birth and purported signature are redacted below to protect his/her privacy.

7. Based on United States Department of State records, I believe that the Individual is a real person who used to reside in the United States and is now living in Uzbekistan. Furthermore, law enforcement has reviewed surveillance video from a location in New Jersey that shows an individual believed to be the defendant ANASHON KAMALOV using the Fraudulent License to cash a check.

8. Further, during the execution of the March 9 Warrant, law enforcement agents also discovered five debit or banking cards in the name of the Individual, including some issued by banks headquartered outside of New York State. Law enforcement also discovered three consecutively numbered blank checks in the name of the Individual, issued by a bank headquartered outside of New York. Two of the checks were signed with the name of the Individual.

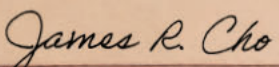
WHEREFORE, your deponent respectfully requests that an arrest warrant issue so that the defendant ANASHON KAMALOV, also known as “Anas,” may be dealt with according to law. Your affiant also respectfully requests that this affidavit and any issued arrest warrant be sealed as the defendant remains at large (although he has been

arrested on unrelated charges as part of a separate investigation) and public disclosure of this affidavit and/or arrest warrant may lead him to notify confederates, flee, or otherwise seek to avoid apprehension.



ALAN FOWLER
Special Agent, Federal Bureau of Investigation

Sworn to before me by telephone this
28th day of April, 2021



THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK